### SULLIVAN & CROMWELL LLP

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# MEMO ENDORSED

See laat page.

August 26, 2021

#### Via ECF

The Honorable Edgardo Ramos,
United States District Judge,
United States District Court for the Southern District of New York,
Thurgood Marshall United States Courthouse,
40 Foley Square,
New York, New York 10007-1312.

Re: *United States* v. *Jermaine Harmon*, 1:20-cr-00549-ER

### Dear Judge Ramos:

We are counsel for the defendant Jermaine Harmon. We write on behalf of Mr. Harmon to respectfully request (i) an adjournment of Mr. Harmon's surrender date; and (ii) an amendment to correct an error in the judgment entered on August 19, 2021.

First, approximately two weeks ago, Mr. Harmon's mother was hospitalized and she subsequently underwent an amputation of approximately one half of one of her feet. She is now at home recovering, but she is currently immobile. As she described in her letter in support of Mr. Harmon's sentencing submission (Ex. G thereto – Attachment #7 to ECF No. 40), Ms. Harmon resides with her son and depends on him for daily care. In light of his mother's recent medical issues, we respectfully request that Mr. Harmon's surrender date be adjourned by one month so that he may be allowed to assist with her recovery until a home-care service can be arranged. This will include, among other things, Mr. Harmon shopping on behalf of the household, preparing his mother's meals, picking up his mother's medication, helping his mother attend follow-up medical appointments, and helping his mother bathe and use the bathroom.

This is Mr. Harmon's first request for an adjournment of his surrender date. We have conferred with Pre-Trial Services, which has no objection to this request, and with the Government, which defers to Pre-Trial Services in this matter. All conditions of Mr. Harmon's pre-surrender release would remain in effect.

Second, on February 16, 2021, Mr. Harmon was sentenced to a term of six months' imprisonment followed by a term of two years' supervised release, and his surrender date has been set for September 3, 2021. On August 19, 2021, a judgment in Mr. Harmon's case was entered,

which listed his sentence as a term of six months' imprisonment followed by a term of *three* years' supervised release. We respectfully request that the judgment entered on August 19, 2021, be amended to reflect the term of two years' supervised release, in accordance with the initial sentence imposed on February 16, 2021. We have conferred with the Government, which does not object to this request.

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Respectfully submitted,

/s/ Nicole Friedlander

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Attorneys for Defendant Jermaine Harmon

cc: Maurene Comey,

Assistant United States Attorney

Defendant's requests are granted. Defendant's surrender date is hereby adjourned to October 4, 2021, and an amended judgment shall be entered reflecting a term of two years' supervised release. The Clerk of Court is respectfully directed to terminate the motion. Doc. 50.

So ordered.

Edgardo Ramos, U.S.D.J

Dated: 8/26/2021 New York, New York